

### **REMARKS**

Claims 1-39 have been rejected. Applicant respectfully traverses these rejections below. Claims 1-39 remain pending.

#### ***Rejections Under 35 USC 103***

Claims 1-30 have been rejected under 35 USC 103(a) as being unpatentable over Maxwell et al., (US Patent 5,675,784), and further in view of Imamura et al. (US Patent No. 6,128,600). Applicant notes that the incorrect patent number (Patent No. 5,999,914) was referenced in the Office Action. The rejection is respectfully traversed. It is submitted that the claims of the present invention are non-obvious and patentable over the claims of the cited patents, and withdrawal of the rejection is respectfully requested.

Applicant respectfully asserts that the current Office Action does not address the amendments made to the claims in the amendment submitted on December 30, 2003. Applicant submits that the claims as previously amended are patentable over the cited references.

The presently claimed invention enables product data to be stored and ultimately transmitted for use in catalogs. Stated another way, the presently claimed invention may be used to enable data to be captured and stored for distribution to customers requesting the catalog data. In other words, the present invention enables a service to be established that captures, stores, and transmits data for use in a catalog to customers who requested that data. Specifically, a customer may specify various products (e.g., identified by a manufacturer SKU and the customer's SKU) for which they would like product data to be transmitted to them. Thus, the claimed invention enables catalog data to be the "product" that is requested and transmitted to customers. In this manner, the customers receiving the data may be able compose a catalog (e.g., by a manufacturer, retailer, or distributor receiving requested product data). Neither of the cited references, separately or in combination, discloses the claimed invention.

Neither Maxwell et al. ("Maxwell") nor Imamura et al. ("Imamura") discloses or suggests the invention of the pending claims. For instance, with respect to claim 1, as amended, neither of the cited references discloses or suggests "a method of distributing data for use in a catalog". In addition, neither of the cited reference

discloses or suggests storing product data including both a manufacturer SKU that identifies the product and a customer SKU that identifies the product, where the customer has requested that the specified product data be distributed to the customer for use in a catalog. Specifically, neither of the cited references discloses or suggests “storing the product data, the product data including both a manufacturer SKU that identifies each of the products and at least one a-customer SKU that identifies each of the products for one or more customers requesting that the specified product data be distributed to the customers for use in a catalog, the each customer SKU being associated with a customer for which the product data is being stored for subsequent distribution to the customer, wherein the stored product data is suitable for use by the customers customer-in an electronic catalog, each of the customer customers being a manufacturer, retailer, or distributor of the products.”

As previously set forth, since the product-SID of Maxwell is the only identifier used to identify a product, Maxwell teaches that a single identifier is sufficient to identify a product. Accordingly, Maxwell teaches away from storing two separate SKUs for a single product.

FIG. 7 of Imamura discloses a product no. 71 and shop ID 70. As disclosed in col. 8, lines 54-67, these are used to associate various products with a particular “virtual shop.” See Summary. It appears that an “electronic catalogue producer” via an electronic mall server may generate product information, as well as an electronic catalogue from the product information. Specifically, as set forth in col. 6, line 60 – col. 8, line 67, the producer of an electronic catalogue operating the electronic shop (“producer of an electronic catalog operating the electronic shop”) is responsible for generating and entering product data. As a result, the operation disclosed in Imamura is operation intensive on the part of the shop owner. Thus, should the manufacturer modify their product number, price or other pertinent information (e.g., color availability), the operator of the electronic shop must modify all product information, as necessary. This operation would be tedious, and would be required for all shop owners intending to sell these products. Moreover, since Imamura requires that data be input by the shop owners, Imamura teaches away from collecting and storing product data “for one or more customers requesting that the specified product data be distributed to the customers for use in a catalog,” as recited in claim 1. Moreover, the combination of the cited references would require that each “shop owner” enter and modify the product data for the shop’s electronic catalog, and would therefore fail to

achieve the desired result. Accordingly, the combination of the cited references would be inoperable for the intended purpose.

In accordance with the claimed invention, product data is stored as requested by customers (e.g., retailer, manufacturer, or distributor) for distribution to those customers. Any change (e.g., addition and/or modification) in data for a particular product therefore is modified prior to transmission to the customers. As a result, a customer (e.g., shop owner or manager) need not input or modify any catalog data. It is also important to note that data for products (e.g., identified by manufacturers' SKUs) that are sold by multiple customers needs only to be stored once in association with the customers' SKUs. As a result, any change made to that data need only be performed once, rather than in association with multiple customers by those customers. Once the data is transmitted to the customers, the customers may then choose to generate a catalog from the data. It is also important to note that the customers may choose to generate a paper catalog as well as an electronic catalog, and therefore are not limited to an electronic catalog as disclosed in Imamura. Since Imamura enables an "electronic shop" to generate an electronic catalog, Imamura teaches away from such a system.

In addition, neither Maxwell nor Imamura, separately or in combination, discloses or suggests storing product data for customers requesting that the product data be distributed to the customers. In other words, neither of the cited references discloses a system designed to store product data for distribution to customers (e.g., manufacturer, retailer, or distributor) requesting that product data, where the product data is suitable for use in an electronic catalog. In other words, the present invention enables product data as an end product to be distributed to a manufacturer, retailer, or distributor of each product for which data is requested, rather than accessed by a user to enable an order to be submitted, as supported by the cited references. Thus, neither of the cited references discloses or suggests storing product data for subsequent distribution to a customer associated with the customer SKU, where the customer is a manufacturer, retailer, or distributor of the products. Moreover, neither of the cited references discloses or suggests transmitting such data to customers. For instance, claims 13, 37-39 recite transmitting such data to customers who requested specific product data for use in a catalog. In fact, both Maxwell and Imamura both teach providing data to an end user who is shopping and purchasing items electronically, rather than providing data to a manufacturer, retailer, or distributor for use in a catalog

they intend to generate from that data. See Abstract. As such, both Maxwell and Imamura teach away from the claimed invention.

In addition, the combination of the cited references would fail to operate as claimed. In other words, the combination would fail to achieve the desired result, which is to enable the generation of a catalog with the stored product data through the use of a customer SKU and a manufacturer SKU for each of the products. Stated another way, it would be impossible to map manufacturer SKUs to customer SKUs associated with a particular manufacturer, retailer, or distributor with only a single SKU. As a result, data could not be easily customized for use by different customers in a catalog using their customer SKUs. In fact, if a customer were to receive data including a single SKU for each product (e.g., manufacturer SKU), these SKUs would most likely be meaningless to the customer receiving the data, and the customer (e.g., manufacturer, retailer, or distributor) would be unable to easily correlate these third party's SKUs to its own SKUs. In addition, it would be impossible to identify the customer(s) who are to receive data for each of the products (and the customers' SKUs), since data for some products may be requested by multiple customers, each of whom may maintain their own SKUs. Accordingly, Applicant respectfully submits that claim 1 is allowable over the cited art.

With respect to claim 2, as amended, neither Maxwell nor Imamura discloses or suggests "A method of maintaining catalog data stored in a system product data file" including "receiving a customer product portfolio file, the customer product portfolio file including at least one SKU associated with each product for which data is requested by a customer for use in a catalog, the customer being a manufacturer, retailer, or distributor of each product for which data is requested by the customer in the customer product portfolio file." In fact, the cited references merely disclose enabling data to be accessed by a user to enable the user to order products. In no manner do the cited references, separately or in combination, disclose or suggest providing data for use in a catalog to a customer according to a customer product portfolio file. Moreover, neither of the cited references discloses or suggests mapping the customer product portfolio file to the system product data file such that each product identified in the customer product portfolio file for which data is not in the system product data file is identified, thereby indicating whether data for each of the products for which data is requested by the customer has been obtained and stored in the system product data file. In addition, neither of the cited references discloses or

suggests capturing data for one or more products identified in the customer product portfolio file that is not in the system product data file, or adding the captured data for the products to the system product data file. Thus, Applicant respectfully asserts that the Examiner has failed to make out a prima facie case of obviousness. Accordingly, Applicant respectfully submits that claim 2 is allowable over the cited art.

With regard to claim 13, as amended, neither Maxwell nor Imamura discloses or suggests “receiving a customer product portfolio file that identifies products for which data is requested, wherein the customer product portfolio file includes at least one SKU associated with each of the products for which data is requested by a customer for use in a catalog, the customer being a manufacturer, retailer, or distributor of the products for which data is requested by the customer in the customer product portfolio file.” Moreover, neither of the cited references discloses or suggests mapping the customer product portfolio file to the system product data file such that each product for which data is in the system product data file is identified. In addition, neither of the cited references discloses or suggests generating enriched product data from the system product data file according to a customer profile, the customer profile indicating data associated with the products for which values are to be transmitted to the customer, or transmitting the enriched product data to the customer transmitting the enriched product data to the customer, wherein the enriched product data is suitable for use by the customer in an electronic catalog. Thus, Applicant respectfully asserts that the Examiner has failed to make out a prima facie case of obviousness. Accordingly, Applicant respectfully submits that claim 13 is allowable over the cited art.

With respect to claim 21, as amended, Applicant respectfully asserts that neither of the cited references, separately or in combination, discloses or suggests “receiving a customer product portfolio file that identifies products for which data is requested by one or more customers, the data being suitable for use in an electronic catalog, the customer product portfolio file including a manufacturer SKU associated with each of the products for which data is requested for use in a catalog, a customer SKU associated with each of the products that corresponds to one of the customers, and a manufacturer identifier identifying a manufacturer of each of the products for which data is requested, each of the customers being a manufacturer, retailer, or distributor of each product for which data is requested by the customer in the customer product portfolio file” or “mapping the customer product portfolio file to

the system product data file such that each product for which data is not in the system product data file is identified, thereby identifying one or more of the products for which data is requested and has not been obtained and stored in the system product data file.” In fact, in no manner do the references, separately or in combination, disclose or suggest receiving a request for product data for use in a catalog or determining whether the requested data has been obtained, as claimed. In other words, the present invention enables product data as an end product to be distributed to a manufacturer, retailer, or distributor of each product for which data is requested, rather than accessed by a user to enable an order to be submitted, as supported by the cited references. As such, the cited references teach away from the claimed invention. Accordingly, Applicant respectfully asserts that the Examiner has failed to make out a prima facie case of obviousness. Therefore, Applicant respectfully submits that claim 21 is allowable over the cited art.

With respect to claim 26, Maxwell fails to disclose or suggest the claimed invention. Specifically, Maxwell fails to disclose or suggest accepting a selection of at least one of the set of attributes corresponding to one of the plurality of categories. The Examiner cites col. 6, lines 59-63. However, Maxwell merely discloses searching for a domain or component, not for an attribute associated with such a component. In other words, Maxwell does not enable a search for attributes such as “speed” or “size” to be performed. As a result, Maxwell fails to disclose or suggest obtaining one or more attribute values corresponding to the selected attributes for each of the selected products from the catalog database, or displaying the obtained attribute values for the selected products. Accordingly, Applicant respectfully submits that claim 26 is allowable over the cited art.

With respect to claim 28, neither Maxwell nor Imamura suggests or discloses a method of querying a catalog database that includes product data for one or more products classified according to a data model, and extracting information that is specified by a catalog component definition from the catalog database together with the data model. Specifically, Maxwell fails to disclose accepting a user query specifying a product and a catalog component to be retrieved for use in a catalog, the catalog component including at least one of a product description, technical specifications, a marketing description, an image, and a URL associated with the product, obtaining a catalog component definition associated with the catalog component, the catalog component definition defining a format for the catalog

component. Specifically, Maxwell fails to define a catalog component definition defining a format for the catalog component for use in a catalog. Moreover, Maxwell fails to disclose extracting information specified by the catalog component definition from the catalog database and the data model, or building a catalog component descriptor from the extracted information and the catalog component definition. Specifically, Maxwell fails to disclose a separate data model and catalog database from which information is extracted for building a catalog component. Accordingly, Applicant respectfully submits that claim 28 is allowable over the cited art.

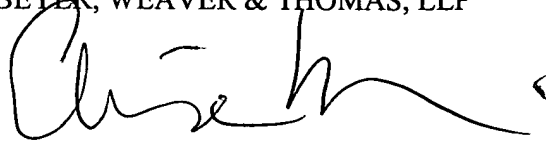
The dependent claims recite additional limitations and therefore also patentable over the cited references. The additional limitations are not further discussed, as the above limitations are sufficient to define over the cited art. Accordingly, withdrawal of the rejection of the pending claims under USC 103 is respectfully requested.

**Conclusion**

The Applicants respectfully maintain that all pending claims are in condition for allowance. Therefore, Applicants respectfully request a Notice of Allowance for this Application from the Examiner. Should any unresolved issues remain, the Examiner is encouraged to contact the undersigned at the telephone number provided below.

Respectfully submitted,

BEYER, WEAVER & THOMAS, LLP

A handwritten signature in black ink, appearing to read 'Elise R. Heilbrunn', with a stylized flourish at the end.

Elise R. Heilbrunn  
Reg. No. 42,649

P.O. Box 778  
Berkeley, CA 94704-0778  
Telephone: (510) 843-6200